

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION**

In re:)	Chapter 11
)	
CIRCUIT CITY STORES, INC., et al.,)	Case No. 08-35653-KRH
)	
Debtors.)	(Jointly Administered)
_____)	
)	
LAURIE LAMBERT-GAFFNEY,)	
)	
Plaintiff,)	
v.)	
)	
CIRCUIT CITY STORES, INC., et al.,)	
)	
Defendants.)	
_____)	

PLAINTIFF'S INITIAL DISCLOSURES

Laurie Lambert-Gaffney (hereinafter "Lambert-Gaffney" or "Plaintiff"), by counsel, pursuant to Rule 26(a)(1) of the Federal Rules of Civil Procedure and Rule 7026(a)(1) of the Federal Rules of Bankruptcy Procedure, files her Initial Disclosures as follows:

PRELIMINARY STATEMENT

The following disclosures are based upon information presently available to the Plaintiff, which he believes to be correct. Said disclosures are made without prejudice to the Plaintiff's right to utilize subsequently discovered facts. The Plaintiff reserves the right to supplement the disclosures insofar as supplementation is allowed or required under the applicable federal or local rules.

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No incidental or implied admissions of fact by the Plaintiff are made by the disclosures below. The only admissions are express admissions.

1. Plaintiff provides below the name and, if known, the address and telephone number of each individual likely to have discoverable information that they may use to support his claims or defenses, unless solely for impeachment, identifying the subjects of the information.

The following witnesses have knowledge of information relating to the loans at issue in this litigation, their origination, the circumstances surrounding the loans and knowledge that no misrepresentations occurred.

Laurie Lambert-Gaffney
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Michelle Mosier
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The Defendant has not yet identified all individuals likely to have discoverable information that it may use to support its claims. At such time as the Defendant identifies such individuals, it will supplement these Initial Disclosures accordingly.

2. Plaintiff describes below, by category and location, the documents that it maintains are relevant to allegations in the pleadings and which it may use to

**support its claims or defenses, unless the documents are to be used solely for
impeachment.**

Debtor's Motion for Order Shortening Notice Period and Limiting Notice on Debtor's Motion for
Order under Bankruptcy Code Sections 105, 363(b) and 503(c)(3) Approving a Wind
Down Incentive and Retention Plan and Authorizing Payment of Wind Down Incentive
and Retention Pay to Plan Participants

Order Granting Debtor's Motion for Order Shortening Notice Period and Limiting Notice on
Debtor's Motion for Order under Bankruptcy Code Sections 105, 363(b) and
503(c)(3) Approving a Wind Down Incentive and Retention Plan and Authorizing
Payment of Wind Down Incentive and Retention Pay to Plan Participants

Circuit City WDR Workstream Status Update

LAURIE LAMBERT-GAFFNEY

By /s/ Robert A. Canfield
Of Counsel

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CERTIFICATE OF SERVICE

I hereby certify that a true copy of Defendant's Initial Disclosures was served by first-class mail, postage prepaid on this 4th day of August, 2010 upon:

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/s/ Robert A. Canfield